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PLEASE TAKE NOTICE that, on April 6, 2009 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant in the above captioned matter will move before the Honorable Toniaanne J. Bongiovanni, U.S.M.J., at the United States District Court District of New Jersey, Clarkson S. Fisher Federal Bldg. and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order pursuant to Local Civil Rule 5.3(c) sealing the following materials: (1) portions of the Response to Plaintiffs' Statement of Material Facts in Support of their Cross-Motion for Summary Judgment of Infringement by Defendants; and (2) Exhibits A, B, C, D, E, and F to the Declaration of Christina L. Saveriano in Support of (a) Defendant Sandoz, Inc.'s Combined Reply Memorandum in Support of its Motion for Summary Judgment of Non-Infringement of the '874 Patent Claims and Response in Opposition to Plaintiffs' Cross-Motion for Summary Judgment of Infringement of the '874 Patent Claims and (b)

Defendant Sandoz, Inc.'s Response to Plaintiffs' Statement of Material Facts in Support of their Cross-Motion for Summary Judgment of Infringement by Defendants.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4) no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(2) have been put forth in the Certification of Christina L. Saveriano, Esq.

PLEASE TAKE FURTHER NOTICE that to the extent that any of the documents sought to be sealed are those designated "Confidential" by Plaintiffs pursuant to the Discovery Confidentiality Order Defendant takes no position as to whether the documents are confidential and leaves Plaintiffs to make any additional argument necessary relating to the sealing of its documents.

PLEASE TAKE FURTHER NOTICE that Defendant relies upon the accompanying Certification of Christina L. Saveriano, Esq. A proposed Order is enclosed.

Dated: March 9, 2009

Respectfully submitted,
HILL WALLACK LLP

By: /s/ Eric I. Abraham
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **Notice of Motion to Seal, Proposed Order to Seal and Certification of Christina L. Saveriano, Esq. in Support of Motion to Seal** is to be electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Date March 9, 2009

/s/Eric I. Abraham
Eric I. Abraham